



Borce Martinoski <martinoskilaw@gmail.com>

NextGear v. Gutierrez 3:18-cv-1617

6 messages

Borce Martinoski <martinoskilaw@gmail.com>
To: "Nicholas M. Gaunce" <ngaunce@eckertseamans.com>

Wed, Oct 31, 2018 at 3:44 PM

Mr. Gaunce,

The defendant came to my office regarding the above matter, and I respectfully request that you consent to an extension for 45 days in order to give the Defendant an opportunity to get PA counsel and to file documents. Please advise ASAP.

Very Truly Yours,
Borce Martinoski, Esq.
Borce Martinoski, LLC
Attorney at Law
75 Essex Street, Suite 220
Hackensack, New Jersey 07601
T: (201) 343 - 7237
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Nicholas M. Gaunce <ngaunce@eckertseamans.com>
To: Borce Martinoski <martinoskilaw@gmail.com>
Cc: "Anthony E. Bush" <ABush@eckertseamans.com>

Thu, Nov 1, 2018 at 12:12 PM

Mr. Martinoski,

The defendant, Paul Gutierrez, can have a twenty-day extension until November 21, 2018 to respond to our client's complaint pending in the Middle District of Pennsylvania. During this time period, we will refrain from entering default against him.

Thank you,

Nick Gaunce

From: Borce Martinoski [mailto:martinoskilaw@gmail.com]
Sent: Wednesday, October 31, 2018 3:44 PM
To: Nicholas M. Gaunce <ngaunce@eckertseamans.com>
Subject: [External] NextGear v. Gutierrez 3:18-cv-1617

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Borce Martinoski <martinoskilaw@gmail.com>
To: "Nicholas M. Gaunce" <ngaunce@eckertseamans.com>
Cc: "Anthony E. Bush" <ABush@eckertseamans.com>

Thu, Nov 1, 2018 at 12:13 PM

Can I get at least 30 days?

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Nicholas M. Gaunce <ngaunce@eckertseamans.com>
To: Borce Martinoski <martinoskilaw@gmail.com>
Cc: "Anthony E. Bush" <ABush@eckertseamans.com>

Thu, Nov 1, 2018 at 12:14 PM

No.

From: Borce Martinoski [mailto:martinoskilaw@gmail.com]
Sent: Thursday, November 01, 2018 12:13 PM
To: Nicholas M. Gaunce <ngaunce@eckertseamans.com>
Cc: Anthony E. Bush <ABush@eckertseamans.com>
Subject: Re: [External] NextGear v. Gutierrez 3:18-cv-1617

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[Quoted text hidden]

Borce Martinoski <martinoskilaw@gmail.com>
To: "Nicholas M. Gaunce" <ngaunce@eckertseamans.com>

Thu, Nov 1, 2018 at 12:15 PM

that is until November 22, which is right before thanksgiving. At least give him until November 30, 2018. Please advise.

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Nicholas M. Gaunce <ngaunce@eckertseamans.com>
To: Borce Martinoski <martinoskilaw@gmail.com>
Cc: "Anthony E. Bush" <ABush@eckertseamans.com>

Thu, Nov 1, 2018 at 12:18 PM

Twenty days from today is until November 21st. We are not willing to grant any longer or further extensions. Your client has already had thirty days to explore retaining counsel.

From: Borce Martinoski [mailto:martinoskilaw@gmail.com]

Sent: Thursday, November 01, 2018 12:16 PM

To: Nicholas M. Gaunce <ngaunce@eckertseamans.com>

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